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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

AMALIA DEEL, et al.

Plaintiffs,

vs.

COUNTY OF FRESNO, et al., ; and  
DOES 1-10,

Defendants.

Case No. 1:24-cv-00885-KES-EPG

**JOINT DISCOVERY STATUS  
REPORT**

Date: May 7, 2025

Time: 10:00 a.m.

Courtroom: 6, 7<sup>TH</sup> Floor

1 Pursuant to the Court's Order (Doc. 20), the parties hereby submit the following  
2 joint report regarding the status of discovery.

3 **STATUS OF CASE**

4 Plaintiffs have propounded written discovery, including Request for Production  
5 of Documents. Plaintiffs have also subpoenaed documents from third parties such  
6 as the Decedent's medical providers and from the Fresno Police Department, which  
7 conducted the investigation into this deputy involved shooting.

8 Defendants have been waiting for a ruling on their pending Motion to Dismiss to  
9 propound written discovery, but plan to propound discovery soon, as the Court  
10 recently took the Motion under submission. (ECF No. 34.)

11  
12 **ADDITIONAL DISCOVERY NEEDED**

13 Defendants need to propound written discovery and subpoena records. The  
14 parties intend to take the depositions of the parties, the involved deputies, and of  
15 other third party witnesses, including the medical examiner.

16  
17 **POTENTIAL FOR SETTLEMENT**

18 After conducting some initial depositions, the parties will be in a better position  
19 to have meaningful settlement discussions, including whether to request a settlement  
20 conference.

21  
22 **OTHER ISSUES**

23 Plaintiffs have been in discussions with the defense regarding some documents  
24 which were identified in the investigation reports which may not have been  
25 produced in response to Plaintiff's Request for Production of Documents. Plaintiffs  
26 remain hopeful that this issue will be resolved without the Court's intervention.

1 Defense counsel is following up with the County regarding the referenced  
2 documents and also remain hopeful this issue will be resolved without the Court's  
3 intervention.

4 Additionally, given the pending Motion to Dismiss, Defendants feel it would be  
5 best to continue the current trial date and pretrial deadlines, including but not limited  
6 to any deadlines regarding non-expert discovery, expert discovery, and dispositive  
7 motions.

8  
9 DATED: April 30, 2025

LAW OFFICES OF DALE K. GALIPO

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11  
12 By /s/ Eric Valenzuela

13 Eric Valenzuela

14 Attorneys for Plaintiffs

15  
16 DATED: April 30, 2025

PORTER SCOTT

17 A PROFESSIONAL CORPORATION

18  
19 By /s/ Alison J. Southard

20 Alison J. Southard

21 Attorneys for Defendants  
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